

USPCIA Subsidiary of
Union Pacific Corporation**Treatment & Recovery Services**

February 7, 1995

William A. Spratin
Director, Air/RCRA/Toxics Division
EPA Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

By Facsimile: (913) 551-7947

Re: Request for One Time Enforcement Discretionary Exemption: Disposal of Low BTU Regulated Waste Mixed with Kiln Fuel

Hydrocarbon Recyclers, Inc. of Wichita is an interim status RCRA transfer, storage, and disposal facility (TSDF), having the EPA I.D. number, KSD007246846. Our primary waste management process is the blending of regulated and non-regulated wastes generated off-site into cement kiln fuel, for fuels substitution management at an approved facility under the Boilers and Industrial Furnaces Rule, 40 CFR 266, Subpart H. The facility which most frequently manages this waste is Systech/Lafarge in Fredonia, Kansas, EPA I.D. number, KSD980633259.

The blended fuels shipment sent to Systech today under our manifest number 03764 contains approximately 100 gallons of hazardous waste, bearing EPA waste number F002, which has a BTU value of 1100 BTU/pound as generated. This material is a mixture of freon and water: two drums were inadvertently pumped into the outbound tanker load. The total volume of the waste stream shipped is 4800 gallons, with a combined BTU value of 11,000 BTU/pound.

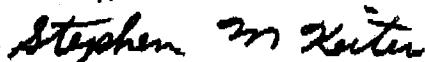
It is our understanding that Systech/Lafarge has the appropriate approvals to manage this mixed waste, but that because it contains a waste which did not qualify as a fuel at the point of generation, certain restrictions may apply to the residues of its combustion under the Land Disposal Restrictions, Part 268.

Because of the excessive cost of alternate management (Incineration) for this mixed material, and the demonstrated ability of Systech to provide environmentally safe disposal for it, Hydrocarbon Recyclers, Inc. of Wichita requests a discretionary enforcement exemption from these restrictions for this shipment of material.

The shipment is waiting for acceptance at Systech/Lafarge at the present time. To avoid unnecessary rejection, transportation, and reshipment of the material, we request that you reply by facsimile today at (316) 268-7555, if at all possible. Please call me at (316) 268- 7500 if you have any questions.

Thank You for your assistance.

Sincerely,



Stephen M. Keiter
Facility Manager

cc: Paul Peters, Systech/Lafarge

Hydrocarbon Recyclers, Inc. of Wichita
2549 North New York
Wichita, Kansas 67219

316/268-7500
Fax 316/268-7555

Our Mission:

Provide the highest quality waste and by-product management services that consistently meet or exceed customer needs and regulatory requirements at competitive cost while enhancing shareholder value.



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RCRA Records Center